

## **REMARKS**

Claims 1-53 have been cancelled. New claims 54-74 have been added. Claims 54-74 are pending.

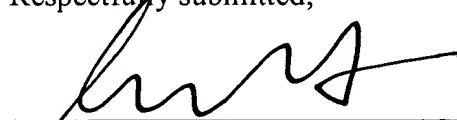
New claim 54 includes “shifting a focus of expansion of a point on the figure independently by an integer value.” None of the references recite estimating a pose by “shifting a focus of expansion of a point on the figure independently by an integer value.” The Examiner has suggested that Nakajima illustrates “that a focus of expansion is shifted by an integer value on a figure in order to non-iteratively improve an accuracy of a constraint,” and that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to shift the focus of expansion of the points on a figure by an integer value using the system of Nakajima et al to non-iteratively improve the accuracy of the constraint in the system of Sabata et al....” This rejection is respectfully traversed. Figures 10(a) and 10(b) and the accompanying text of Nakajima are described as “problems encountered by a conventional method.” If Nakajima relates in any way to this application, it teaches away from “shifting a focus of expansion of a point on the figure independently by an integer value.” Thus, applicants believe that claim 54 is allowable. Claim 61 and Claim 71 also recite “shifting a focus...independently by an integer value” and are believed to be allowable for the same reason.

Claims 55-60 and 74 depend from Claim 54, Claims 62-70 depend from Claim 61, and Claims 72-73 depend from Claim 71, and are believed to be allowable for the same reason stated above.

Reconsideration of the application and allowance of all claims are respectfully requested based on the preceding remarks. If at any time the Examiner believes that an interview would be helpful, please contact the undersigned.

Dated: 11-22-04

Respectfully submitted,



Lee Van Pelt

Registration No. 39.352

V 408-973-2590

F 408-973-2595

VAN PELT AND YI, LLP  
10050 N. Foothill Blvd., Suite 200  
Cupertino, CA 95014